

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	
	:	Chapter 11
WOODBRI	:	
GE GROUP OF COMPANIES,	:	
LLC <i>et al.</i> ,	:	Case No. 17-12560 (BLS)
	:	
<i>Remaining Debtors.</i>	:	(Jointly Administered)
	:	
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MICHAEL GOLDBERG, as Liquidating	:	Adv. Proc. Case No. 19-51027
Trustee of the Woodbridge Liquidation Trust,	:	
	:	
<i>Plaintiff,</i>	:	
	:	
v.	:	
	:	
KENNETH HALBERT,	:	
	:	
<i>Defendant.</i>	:	

STIPULATION TO AMEND DISCOVERY DEADLINES

Plaintiff Michael Goldberg, as Liquidating Trustee of the Woodbridge Liquidation Trust (the “**Trustee**”) and Defendant Kenneth Halbert (“**Halbert**” and together with the Trustee, collectively, the “**Parties**”), by and through their undersigned counsel hereby stipulate and agree that:

RECITALS

WHEREAS, on September 4, 2020, this Court entered the *Scheduling Order* [ECF No. 23] setting forth certain dates and deadlines related to mediation and discovery applicable to this adversary proceeding;

WHEREAS, the Parties participated in mediation as required by the Scheduling Order and on February 9, 2022, the mediator filed the *Mediator's Certificate of Completion* [ECF No. 89];

WHEREAS, on or about February 14, 2022, the Trustee served on Halbert the *Plaintiff's Initial Disclosures*, *Plaintiff's First Set of Requests for Production Propounded to Defendant Kenneth Halbert* (the “**Document Requests**”), *Plaintiff's First Set of Interrogatories to Defendant Kenneth Halbert* (the “**Interrogatories**”), and *Plaintiff's First Set of Requests for Admission to Defendant Kenneth Halbert* (the “**Admission Requests**” and together with the Document Requests and Interrogatories, collectively, the “**Discovery Requests**”);

WHEREAS, on or about March 7, 2022, Halbert retained White and Williams LLP to replace his prior counsel and represent him in this adversary proceeding and the *Notice of Substitution of Counsel* [ECF No. 91] was filed with this Court;

WHEREAS, to date, White and Williams LLP has not received any documents from former counsel;

WHEREAS, in order to provide White and Williams LLP time to become adequately familiar with the claims and defenses in this adversary proceeding as well as appropriate time to respond to the Discovery Requests, Halbert wishes to extend certain dates and deadlines in the Scheduling Order and the deadlines to respond to the Discovery Requests; and

WHEREAS, the Trustee consents and agrees to Halbert's requests for the extensions of time as stipulated below.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND ORDERED THAT:

1. The deadline for Halbert to send to the Trustee his initial disclosures pursuant to Fed. R. Civ. P. 26 (a)(1) is extended to April 11, 2022; it being acknowledged that the Trustee has already timely sent his initial disclosures pursuant to Fed. R. Civ. P. 26 (a)(1) to Halbert.
2. The deadline for Halbert to respond to the Discovery Requests is extended to April 30, 2022.

3. The fact discovery deadline in the above captioned matter is extended from June 9, 2022 to July 11, 2022.

Dated: March 17, 2022

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IT IS SO ORDERED this 18th day of March 2022.



HONORABLE J. KATE STICKLES,
UNITED STATES BANKRUPTCY JUDGE